

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10216 JLT

CARLOS PINEDA and  
ALEXANDRA PEREZ,  
Plaintiffs,

v.

DANIEL KEELER, DENNIS  
HARRIS, JOSPEH R. WATTS,  
JOSEPH P. TOOMEY,  
WILLIAM J. GALLAGHER,  
EDWARD GATELY, JANINE  
BUSBY, and the CITY OF  
BOSTON  
Defendants.

**ASSENTED TO DEFENDANTS' MOTION TO ENTER DEADLINES FOR  
DISCOVERY AND MOTIONS FOR SUMMARY JUDGMENT**

Defendants hereby request that the Court enter deadlines for discovery and motions for summary judgment. Such deadlines will not affect the trial date of this matter and will promote judicial economy.

Plaintiffs, on April 26, 2007, filed an assented to motion to continue the trial date, based on Plaintiffs' need to take more depositions. The motion was allowed and the trial is scheduled for July 23, 2007. However, Plaintiffs did not request an extension of the deadlines for discovery and motions for summary judgment.

Therefore, Defendants propose the following:

1. All depositions (and any other discovery allowed by the Court) shall be completed by June 8, 2007.

2. Motions for summary judgment shall be filed by June 18, 2007.

3. Oppositions to motions for summary judgment shall be filed within 21 days, July 9, 2007.

4. Counsel for Plaintiffs, Stephen B. Hrones, has assented to this motion.

5. The trial date - July 23, 2007 - will not be affected by this motion for deadlines relating to discovery and motions for summary judgment.

6. Allowing this motion will not prejudice any party to the action and will further the interests of justice and judicial economy.

WHEREFORE, Defendants respectfully request that this Honorable Court allow their motion so that discovery shall end on June 8, 2007, and motions for summary judgment shall be filed by June 18, 2007, with oppositions due 21 days later.

Respectfully submitted,

DEFENDANTS DANIEL KEELER, DENNIS  
HARRIS, JOSEPH R. WATTS, JOSEPH  
P. TOOMEY, WILLIAM J. GALLAGHER,  
EDWARD GATELY, JANINE BUSBY and  
CITY OF BOSTON

William F. Sinnott  
Corporation Counsel

By their attorney:

/s/ Thomas Donohue  
Thomas Donohue, BBO# 643483  
Assistant corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617) 635-4039

#### 7.1 Certification

Undersigned counsel certifies that on May 8, 2007, pursuant to LR, D. Mass. 7.1(a)(2), he spoke with an employee of Plaintiffs' counsel who assented to the Defendants request to extend the deadlines for summary judgment.

/s/ Thomas Donohue  
Thomas Donohue

#### CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 8, 2007.

/s/ Thomas Donohue  
Thomas Donohue